

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HAPAG-LLOYD AKTIENGESELLSCHAFT,

Plaintiff,

14 Civ. 9949 (VEC)

-against-

U.S. OIL TRADING LLC, O.W. BUNKER  
GERMANY GMBH, O.W. BUNKER & TRADING  
A/S, O.W. BUNKER USA, INC., ING BANK N.V.,  
CRÉDIT AGRICOLE CIB,

Defendants.

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U.S. OIL TRADING LLC,

Plaintiff,

15 Civ. 6718 (VEC)

-against-

M/V VIENNA EXPRESS, her tackle, boilers, apparel,  
furniture, engines, appurtenances etc., *in rem*, and M/V  
SOFIA EXPRESS, her tackle, boilers, apparel, furniture,  
engines, appurtenances etc., *in rem*,

Defendants.

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HAPAG-LLOYD AKTIENGESELLSCHAFT, as  
claimant to the M/V VIENNA EXPRESS,

Counter-Claimant and Third-Party Plaintiff,

**Oral Argument Requested**

-against-

U.S. OIL TRADING LLC,

Counter-Defendant and

O.W. BUNKER GERMANY GMBH, O.W. BUNKER  
& TRADING A/S, ING BANK N.V., and CRÉDIT  
AGRICOLE CORPORATE AND INVESTMENT  
BANK,

Third-Party Defendants.

**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** that, upon the accompanying Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1(a); the memorandum of law in support of motion for summary judgment; the declaration of Thor A. Nielsen dated May 12, 2016, and the exhibits annexed thereto; the declaration of Lee Weber dated May 12, 2016, and the exhibits annexed thereto; the declaration of John R. Keough dated May 13, 2016, and the exhibits annexed thereto; and all prior proceedings and papers in this action, defendant U.S. Oil Trading LLC (“USOT”), by its attorneys, Clyde & Co US LLP, will move this Honorable Court on July 20, 2016, at 10:00 a.m., or as soon thereafter as counsel may be heard, at Courtroom 443 of the United States Courthouse for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order granting USOT summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and such other and further relief as may be just in the premises.

Dated: New York, New York  
May 13, 2016

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By: /s/ John R. Keough  
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